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Lead Counsel for the Direct Purchaser Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE CAPACITORS ANTITRUST LITIGATION
THIS DOCUMENT RELATES TO:
THE DIRECT PURCHASER CLASS ACTION

Master File No. 3:17-md-02801-JD

Case No. 3:14-cv-03264-JD

**DECLARATION OF KENDALL S.
ZYLSTRA IN FURTHER SUPPORT OF
DIRECT PURCHASER CLASS'S
MOTION FOR FINAL APPROVAL OF
PROPOSED SETTLEMENTS WITH
DEFENDANTS AVX, ELNA, HOLY
STONE, KEMET, PANASONIC,
SHINYEI, SHIZUKI AND TAITSU**

Date: September 17, 2020
Time: 10:00 a.m.
Courtroom: 11, 19th Floor

I, Kendall S. Zylstra, hereby swear, under penalty of perjury, as follows:

1. I am a Senior Vice President at Rust Consulting, Inc. (“Rust”). I submit this Declaration in Further Support of Direct Purchaser Class’s Motion for Final Approval of Proposed Settlements with Defendants AVX, ELNA, Holy Stone, KEMET, Panasonic, Shinyei, Shizuki and Taitsu (the

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1 “Motion”). MDL ECF No.¹ 1360. I have personal knowledge of the facts set forth in this declaration,
2 and if called as a witness, could and would testify competently to them. I make this declaration pursuant
3 to 28 U.S.C. § 1746.

4 2. Pursuant to prior order of the Court, notice of the Round Four Settlements has been
5 given. The notice program is now complete.

6 3. Rust has received no objection to the Motion. MDL ECF No. 1360.

7 4. Rust has received no objection to the Direct Purchaser Class’s Motion for Attorney’s
8 Fees and Reimbursement of Expenses. MDL ECF No. 1362.

9 5. Rust has received and processed requests for exclusion from the Round 4 Settlements.
10 Attached hereto as **Exhibit A** is a true and correct summary of the entities requesting exclusion.

11 6. As of September 8, 2020, Rust has received and processed a total of 516 Claim Forms in
12 connection with the Round Four Settlements. Excluding duplicate claim submissions, these claims
13 represent 80.1% of the total Class commerce for the relevant time period.

14 7. Consistent with the notice program completed with respect to the prior settlements, all
15 potential Settlement Class members for which notices and claim forms that had undeliverable Claim
16 Forms for the First, Second or Third Round Settlements were mailed Notices and Claim Forms for the
17 Fourth Round Settlements. If further research, including skip-tracing, identified alternative addresses.
18 Rust mailed Notices and Claim Forms to such addresses. If further research did not identify alternative
19 addresses, Rust mailed notice to potential Settlement Class members’ best-known addresses, including
20 to class members for which notices were returned as undeliverable. As of August 31, 2020, the date Rust
21 last traced undeliverable notices, 405 notices and Claim Forms had been returned to Rust as
22 undeliverable with no forwarding address received. Rust attempted to locate a better address for each
23 one.

24 8. Of the 405 returned undeliverable claim forms traced by Rust, Rust determined better
25 addresses for seven Settlement Class members. Rust then mailed Claim Forms to those addresses. One
26

27
28 ¹ “MDL ECF No. ___” citations are to 3:17-md-02801.

1 of the seven mailed Claim Forms was subsequently submitted by a Settlement Class member. Of the
2 seven, no Claim Forms were returned as undeliverable.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed on September
4 8, 2020.

5 By: /s/ Kendall S. Zylstra
6 Kendall S. Zylstra

EXHIBIT A

Summary of Entities Requesting Exclusion

Entities Requesting Exclusion from the Round 4 Settlements

Requesting Entity	Entity/Affiliate with Record of Transactions	Location
Dell Technologies, Inc.	Dell Computer Corporation	Round Rock, TX
	EMC Corporation	Hopkinton, MA
	Wyse Technology	Round Rock, TX
Microsoft Mobile/Nokia	Microsoft Mobile	Redmond, WA
	Nokia	Naperville, IL
	Nokia	San Diego, CA

Entities Requesting Partial Exclusion (ELNA)

Blackberry Ltd.	Blackberry Corporation	Pleasanton, CA
Plexus Corp. / Electronic Assembly Corp.	Electronic Assembly Corporation	Neenah, WI
	Plexus Corporation	Neenah, WI
	Plexus	Nampa, ID
	Plexus Corp	Appleton, WI
	Plexus Corp	Neenah, WI
	Plexus Services Corp - N	Neenah, WI
	Plexus Int Sales & Logistics	Neenah, WI

Entities Requesting Partial Exclusion (Holy Stone)

Blackberry Ltd.	Blackberry Corporation	Pleasanton, CA
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Entities Requesting Partial Exclusion (Panasonic)

Blackberry Ltd.	Blackberry Corporation	Pleasanton, CA
Hon Hai/Foxconn/CTI	Hon Hai	Houston, TX
	NSG Technology / Foxconn	San Jose, CA
	Competition Team Ireland	San Jose, CA
Plexus Corp. / Electronic Assembly Corp.	Electronic Assembly Corporation	Neenah, WI
	Plexus Corporation	Neenah, WI
	Plexus	Nampa, ID
	Plexus Corp	Appleton, WI
	Plexus Corp	Neenah, WI
	Plexus Services Corp - N	Neenah, WI
	Plexus Int Sales & Logistics	Neenah, WI